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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PHILLIP PULIDO,

Defendants.

CASE NO. 1:23-CR-00083-JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT

DATE: September 17, 2025
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on September 17, 2025.
2. By this stipulation, defendant now moves to continue the status conference until November 19, 2025, and to exclude time between September 17, 2025, and November 19, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant desires additional time to further review discovery, discuss potential resolution with her client and the government, and investigate and prepare for trial.

1 c) The parties have been in discussion about a potential resolution to this matter, and
2 potential pre-trial litigation in the alternative. The parties believe that by the next status date, the
3 case will either be resolved or the parties will be prepared to set a trial date and potential motion
4 schedule.

5 d) The parties request a further status date due to the above factors.

6 e) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking
8 into account the exercise of due diligence.

9 f) The government does not object to the continuance.

10 g) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of September 17, 2025 to November
15 19, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
16 Code T4] because it results from a continuance granted by the Court at defendants' request on
17 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
18 best interest of the public and the defendants in a speedy trial.

19 i) The parties also agree that this continuance is necessary for several reasons,
20 including but not limited to, the need to permit time for the parties to exchange supplemental
21 discovery, engage in plea negotiations, and for the defense to continue its investigation and
22 preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 11, 2025

ERIC GRANT
United States Attorney

/s/ STEPHANIE M. STOKMAN
STEPHANIE M. STOKMAN
Assistant United States Attorney

Dated: September 11, 2025

/s/ CHRISTINA CORCORAN
CHRISTINA CORCORAN
Counsel for Defendant
PHILLIP PULIDO

ORDER

The parties shall be prepared to select a mutually agreeable trial date at the November 19, 2025, status conference.

IT IS SO ORDERED.

Dated: **September 11, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE